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Attorneys for Plaintiff
MICHAEL ANDREWS

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

MICHAEL ANDREWS,

Plaintiff,

v.

EQUINOX HOLDINGS, INC., a Delaware
corporation; and DOES 1 to 10, inclusive,

Defendants.

Case No. 3:20-cv-00485-SK

**PLAINTIFF'S REQUEST TO ENTER
JUDGMENT**

Judge: Hon. Sallie Kim

Date of Removal: January 22, 2020
Complaint Filed: December 27, 2019
Trial Date: November 2, 2021

1 Pursuant to Defendant's Rule 68 Offer of Judgment, notice of acceptance of which
2 Plaintiff Michael Andrews filed with the Court on September 7, 2021, through his
3 undersigned counsel, Plaintiff hereby requests that the Court enter judgment in favor of
4 him against Defendant Equinox Holdings, Inc. providing that (1) Defendant shall pay
5 Plaintiff the sum of One Hundred Sixty Two Thousand Dollars and No Cents
6 (\$162,000.00) for his damages, within fifteen (15) days of entry of the judgment; (2) the
7 Court shall retain ancillary jurisdiction of the matter to determine and Order the amount of
8 reasonable attorneys' fees and costs incurred by Plaintiff up to August 23, 2021 Defendant
9 shall pay his attorneys; and (3) the Court shall award post-judgment interest at the rate
10 provided in 28 U.S.C. § 1961 on both the damages and the attorneys' fees and costs
11 commencing to accrue the day following entry of the Judgment.

12 A [Proposed] Judgment is attached hereto.

13
14 DATED: September 7, 2021

Respectfully submitted,

15 ROSEN BIEN GALVAN & GRUNFELD LLP

16 By: Sanford Jay Rosen

17 Sanford Jay Rosen

18 Attorneys for Plaintiff MICHAEL ANDREWS
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